

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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EK VENTURES I, LLC; DAVID L.  
TAYLOR; DAVID L. TAYLOR AND  
VIRGINIA L. TAYLOR as TRUSTEES  
FOR THE TAYLOR FAMILY  
REVOCABLE TRUST; and  
FLEXTRONICS INTERNATIONAL  
LTD.,

Plaintiffs,

v.

JAMES R. BARTLETT and Z.B.R.  
PUBLICATIONS, INC.,

Defendants

and

JAMES R. BARTLETT,

Third-Party Plaintiff,

v.

GLOBALWARE SOLUTIONS, INC.,  
ANTHONY RUDSTON and  
BRADLEY A. JAY,

Third-Party Defendants

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No: 1:03-CV-12506-NMG

**JOINT MOTION TO EXTEND SCHEDULING ORDER**

Plaintiffs EK Ventures, I, LLC *et al.*, (collectively, “Plaintiffs”), Defendants James R. Bartlett and Z.B.R. Publications, and Third-Party Defendants GlobalWare Solutions, Inc., Anthony Rudston, and Bradley A. Jay, hereby jointly move to extend the scheduling dates in this matter. As grounds for their Motion, the parties state as follows:

1. This action was commenced on December 12, 2003, asserting claims arising from a February 4, 2000 Stock Purchase and Sale Agreement.

2. The discovery period in this case is set to close on December 15, 2004, with plaintiffs expert reports due by October 15, 2004, defendants' expert reports due by November 15, 2004, dispositive motions filed by January 15, 2005, and the case ready for trial by March 15, 2005.

3. The parties have been diligently negotiating a settlement of this action. In order to facilitate settlement, the parties request an extension of each of these deadlines by three (3) months.

4. Accordingly, the parties respectfully request that the Court extend the current scheduling order as follows:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
All final experts are to be designated and disclosure of information contemplated by FRCP, Rule 26 provided by the Plaintiff	10/15/04	1/15/05
All final experts are to be designated and disclosure of information contemplated by FRCP, Rule 26 provided by the Defendants	11/15/04	2/15/05
Discovery to be completed	12/15/04	3/15/05
Dispositive motions filed	1/15/05	4/15/05
Pretrial conference	2/05	5/05
Trial	3/15/05	6/15/05

7. Neither the parties nor the Court will be prejudiced by this extension of the scheduling order.

8. This is the first request for an extension of scheduling dates.

WHEREFORE, the parties respectfully request that the Court grant this Joint Motion To  
Extend Scheduling Dates.

Respectfully submitted,

EK VENTURES I, LLC; DAVID L.  
TAYLOR; DAVID L. TAYLOR and  
VIRGINIA L. TAYLOR as trustees for the  
TAYLOR FAMILY REVOCABLE TRUST;  
and FLEXTRONICS INTERNATIONAL  
LTD.,

JAMES R. BARTLETT,

By their attorneys,

By his attorneys,

/s/ Douglas R. Roach, DMR by permission

/s/ Thomas Fitzpatrick, DMR by permission

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Z.B.R. PUBLICATIONS, INC.,  
GLOBALWARE SOLUTIONS, INC.,  
ANTHONY RUDSTON, and BRADLEY  
A. JAY

By their attorneys,

/s/ David M. Ryan

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Dated: September 9, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each party electronically on September 9, 2004

/s/ David M. Ryan

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David M. Ryan